| UNITED STATES OF AMERICA |) | |
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| |) | |
| v. |) | |
| |) | STIPULATION OF |
| Manning, Bradley E. |) | EXPECTED TESTIMONY |
| PFC, U.S. Army, |) | |
| HHC, U.S. Army Garrison, |) | SSG Peter Bigelow |
| Joint Base Myer-Henderson Hall |) | • |
| Fort Myer, Virginia 22211 |) | 16 June 2013 |

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if SSG Peter Bigelow were present to testify during the merits and pre-sentencing phases of this court-martial, he would testify substantially as follows:

- 1. I am currently the Battalion S4 NCOIC for the 782d Brigade Support Battalion, 82d Airborne Division, Fort Bragg, North Carolina. I recently left my position as the Supply Sergeant for the 2d NATO Signal Battalion in Italy. I have been active duty Army since 2004. Prior to that, I served in the Army National Guard from 1999 to 2000 and the Marine Corps from 1989 to 1993 and again from 1996 to 1999.
- 2. I know PFC Manning because he came to work for me in the supply shop after leaving the S2 shop during our deployment to Contingency Operating Base (COB) Hammer, Iraq. He left the S2 shop on approximately 8 May 2010 and joined the supply room the following day, on approximately 9 May 2010. At that time, I was the Headquarters and Headquarters Company (HHC), 2d Brigade (BDE), 10th Mountain Division Supply Sergeant. In this position, I was responsible for supporting the Brigade and also handling the logistical needs for the Brigade Headquarters Company and Staff consisting of my Company Commander; Executive Officer; and the arms, supply, and orderly room personnel. In the supply room, PFC Manning would help out with tasks, such as moving supplies, photocopying, or running messages or paperwork to other sections. I did not always have things for PFC Manning to do, so he typically had several hours a day during his shift where he did nothing but read a book or surf the internet.
- 3. I first became aware of the investigation and misconduct at issue in these proceedings after getting back from a supply run to Victory Base Complex in Iraq on 27 May 2010. Upon my return, I was told to get PFC Manning because CID was en route to question him. That instruction came from CPT Lim, the 2d BDE S2. He asked me to stay with PFC Manning until CID arrived. After I dropped my gear, I went immediately to the Supply Office, got PFC Manning, and requested my Armor Sergeant watch him until otherwise instructed.
- 4. CID arrived that evening. They interviewed me regarding leaked material and PFC Manning's computer usage. I advised the investigating agents that PFC Manning had had access to my NIPR and personal computer, and that, while I did not know if PFC Manning had used my SIPR machine, I had seen him sitting behind it. I consented to a CID agent taking my personal laptop. The CID agent also collected my Government NIPR and SIPR hard drives. I asked that the agent to take only the hard drives from the Government computers, because, after CID's investigation of the S2 shop, we were running out of computer terminals. I signed my personal

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computer and the supply room NIPR and SIPR hard drives over to the agent on an evidence custody form that she supplied.

5. PFC Manning used my personal computer and my NIPR computer. I let him use my personal computer after I noticed that he was checking his personal email and surfing the web on the government computer. At no point did I ever log into any of PFC Manning's personal accounts, such as Gmail, Amazon or Charles Schwab. I also did not conduct any searches on crossdressing and did not purchase a book on Amazon called "Facial Feminization Surgery – A Guide for the Transgendered Woman." I did not know what the Global Address List (GAL) was. I never searched for any information related to it, nor did I ever download or take any actions to otherwise extract it or information related to it. I also never searched for information relating to "Julian Assange," "Wikileaks," or "vba outlook write text file." I also have never named a folder or file with the word "blah," particularly not one on my Government NIPR computer.

ANGEL MOVERGAARD

CPT, JA

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THOMAS F. HURLEY

MAJ. JA

Military Defense Counsel

BRADIEY E. MANNING

PFC, USA Accused